

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE CATTLE AND BEEF
ANTITRUST LITIGATION

This Document Relates To:
ALL CASES.

Case No. 22-md-03031 (JRT/JFD)

**DEFENDANTS' MOTION TO
COMPEL DISCOVERY FROM
WITNESS 1 (JASON FULLERTON)**

Defendants, by and through their undersigned counsel, hereby move the court for an order compelling discovery from third-party fact witness James Fullerton (“Fullerton”), who is referenced in Plaintiffs’ complaint as “Witness 1.” Case No. 19-cv-1222, ECF No. 312 ¶ 117. Specifically, Defendants request an Order compelling Fullerton to search for and produce documents in response to Defendants’ Subpoena Requests Nos. 14, 15, 17, and 20-31, from January 1, 2014 through December 28, 2020, to search for and produce all responsive documents that are being held in the files of his attorney, and to produce all responsive documents withheld based on an assertion of Plaintiffs’ work product. This Motion is made pursuant to Federal Rules of Civil Procedure 26 and 45. This Motion is supported by all files, records, and proceedings herein, including the supporting memorandum of law, declaration, and exhibits filed herewith, and the arguments of counsel.

Dated: November 7, 2023

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